

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS PAUL M. LION
(OCA/USPS-T4-44-46)
(August 9, 1996)

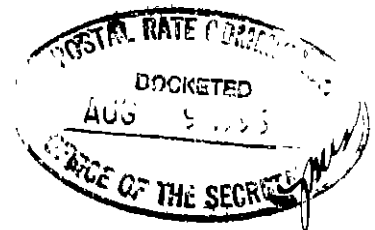
Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

Emmett Rand Costello for
SHELLEY DREIFUSS
Attorney



OCA/USPS-T4-44. Refer to LR-SSR-113, page 4, and the response to OCA/USPS-T4-23.

- a. Please confirm that the "P.O. Box Unit Survey" instructions requested that reporting facilities "[r]eport the total number of caller service customers" If you do not confirm, please explain.
- b. What evidence do you have that "unit managers" responding to the line, "Caller Service: Number of Customers" in the survey referred to in (a) above were providing a count of the "caller numbers that are assigned to the callers . . . for each separation used"? (See Response to OCA/USPS-T4-23; DMM § D920.1.4.)
- c. What evidence do you have that "unit managers" responding to the line "Caller Service: Number of Customers" in the survey referred to in (a) above were providing a count of the "number of persons or organizations receiving caller service"? (See Response to OCA/USPS-T4-23; DMM § D920.1.2.)
- c. Please provide any additional instructions to "unit managers" responding to the survey referred to in (a) above concerning the data requested for "Caller Service: Number of Customers."

OCA/USPS-T4-45. Refer to LR-SSR-113, page 4, and the response to OCA/USPS-T4-23. Suppose that an office has three caller service customers and a total of six caller service numbers or separations. Suppose also that the "unit manager" mistakenly enters "6" for the total number of caller service customers in the "P.O. Box Unit Survey."

- a. Please confirm that such an error would not be detected in your edit process of data from the "P.O. Box Unit Survey."
- b. If you do not confirm, please explain what source of additional data was relied on to identify the "6" as being incorrect.

OCA/USPS-T4-46. Refer to LR-SSR-104, page 1, as revised August 7, 1996.

- a. Please provide the "Total Number of Firms or Callers" and the "Total Number of Separations" for the years 1989 to 1995, inclusive.
- b. Please explain the reasons for any decline in the number of callers and/or separations during this period.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

Emmet Rand Gostich for
SHELLEY DREIFUSS
Attorney

Washington, D.C. 20268-0001
August 9, 1996